## EXHIBIT A

LEONARD C. JEFFERSON Plaintiff

**V**.

C.A. 14-475-M

DAVID PICCIRILLO, Nurse at Rhode Island's Adult Correctional Institution; DR. BANSAL & DR, BLANCHETTE, Treating Physicians at the Adult Correctional Institution; DR. FRED VOHR, Medical Program Director at the Adult Correctional Institution; and ASHBEL T. WALL, Director of the Rhode Island Department of Corrections Defendant

## **TERM SHEET**

After participating in the Federal Mediation process, and in the interest of mutually resolving the pending civil action, all parties in the above-captioned lawsuit have agreed to the following:

- 1. All Defendants agree that Leonard C. Jefferson will be examined by a licensed, independent board certified ENT M.D. and Allergist M.D. Any such physician cannot be an employee of the R.I. Department of Corrections (the "DOC") or a contract employee of the RIDOC. Mr. Jefferson will be sent to the referenced specialists within a reasonable period of time. It is agreed that Mr. Jefferson will visit each specialist at least once. In the discretion of the specialist, Mr. Jefferson may have a second visit with the specialist. The R.I. Department of Corrections agrees to be bound by the diagnosis and recommendation for treatment, if necessary, of each specialist. Any medication prescribed to Mr. Jefferson must be available through RIDOC's pharmacy formulary. To the extent medical treatment of Mr. Jefferson can be provided at the RIDOC, said treatment shall be consistent with safety and security interests. The cost of the ENT M.D. and the Allergist M.D. shall be paid equally between the Defendants.
- 2. All Defendants agree that Defendant, Nurse David Piccirillo, will not perform any ear washing, if medically necessary, of Mr. Jefferson's ears.

- 3. The Rhode Island Department of Corrections agrees to consider fully and in good faith the issue of inmate clothing at the Maximum Security Facility. As part of this process, input from Mr. Jefferson will be considered.
- 4. Leonard C. Jefferson voluntarily agrees to dismiss all claims against all named Defendants. No money damages, attorney's fees or costs shall be paid by Defendants or by the Plaintiff.

Plaintiff, pro se

Defendants,

David Piccirillo and A.T. Wall

Thomas A. Palombo, AAG

Defendants

Dr. Bansal, Dr. Blanchette & Dr. Vohr

Defendant

R.I. Department of Corrections

Jeffrey Latham, Esq.

Michael B. Grant, Deputy Chief Legal

DATED: April 15, 2015

- 3. The Rhode Island Department of Corrections agrees to consider fully and in good faith the issue of inmate clothing at the Maximum Security Facility. As part of this process, input from Mr. Jefferson will be considered.
- 4. Leonard C. Jefferson voluntarily agrees to dismiss all claims against all named

  Defendants. No money damages, attorney's fees or costs shall be paid by Defendants or
  by the Plaintiff.

Plaintiff, pro se

Defendants,
David Piccirillo and A.T. Wall

Leonard C. Jefferson

Thomas A. Palombo, AAG

Defendants

Dr. Bansal, Dr. Blanchette & Dr. Vohr

Defendant R.I. Department of Corrections

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Michael B. Grant, Deputy Chief Legal

DATED: April 15, 2015